

Daniel B. Olmos (CA SBN 235319)



600 University Avenue
Palo Alto | CA | 94301
T 650.326.2980 | F 650.326.9704

Email: dolmos@nbo.law

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION**

UNITED STATES,

Plaintiff,

vs.

IRMA OLGUIN, JR.,

Defendant.

Case No. 1:24-cr-00159 JCC BAM

MOTION TO EXONERATE AND ORDER

Defendant Irma Olguin, Jr., through undersigned counsel, respectfully submits this Motion to Exonerate and the attached Proposed Order with respect to the release of the property bond used to secure Ms. Olguin's pretrial release.

On December 13, 2023, Defendant Irma Olguin, Jr. was granted release from custody pursuant to a Deed of Trust (No. 2023-0112399) offered in support of a property bond which secured her release. (See Docket No. 27.) The name of the Trustor/Property Owner is Irma L. Oguin. The city and state of the property posted on the Deed of Trust is Caruthers, California. By this motion I request the exoneration of the property bond and full reconveyance of the Deed of Trust.

///

///

1 In addition, by this motion I request the return of Ms. Olguin's United States Passport, No.
2 546895937 (United States Passport Card No. C12467490), which was surrendered to the Court on
3 November 9, 2023.

4 Ms. Olguin was sentenced on December 17, 2024, to 108 months of imprisonment and
5 surrendered to serve her sentence on March 18, 2025.

6
7 Dated: March 24, 2025

Respectfully submitted,

8 NOLAN BARTON OLMOS & LUCIANO, LLP

9 /s/ Daniel B. Olmos

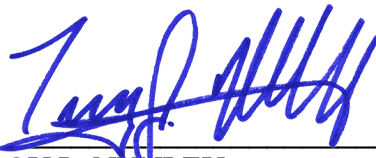
10 Daniel B. Olmos

11 Attorney for Defendant Irma Olguin, Jr.

12
13
14 **ORDER**

15
16 GOOD CAUSE HAVING BEEN SHOWN, it is hereby ordered that the property bond
17 noted above be exonerated and a full reconveyance be provided to the surety. In addition, it is
18 hereby ordered that Ms. Olguin's United States Passport be returned. All documents should be
19 returned to Ms. Olguin's attorney of record, Daniel B. Olmos.

20 DATED: March 26, 2025

21
22 
23 TROY L. NUNLEY
24 CHIEF UNITED STATES DISTRICT JUDGE